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Attorneys for Defendant BlendJet Inc.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

BLENDTEC INC., a Utah corporation, Plaintiff,	MOTION FOR WITHDRAWAL OF COUNSEL
v.	Case No. 2:21-cv-00668-TC-DBP
BLENDJET INC., a Delaware Corporation, Defendant.	Judge Tena Campbell Magistrate Judge Dustin B. Pead

Pursuant to DUCivR 83-1.3, Nathan D. Thomas and Elizabeth M. Butler, and the law firm of Parsons Behle & Latimer, Martin Bader, Jesse Salen, and the law firm of Sheppard, Mullin,

Richter & Hampton, LLP, and Patrick McGill and the law firm of McGill & Co., P.C.
(collectively, "Counsel"), hereby move to withdraw as counsel for:

Client: BlendJet Inc.
535 Getty Court, Suite A
Benicia, CA 94510
Tel.: (844) 588-1555
Email: John@BlendJet.com
Ryan@BlendJet.com

The reasons for withdrawal are as follows: There has been a breakdown in the attorney-client relationship and BlendJet is currently unable to fulfill its obligations to counsel.

In the event this motion is granted, new counsel for BlendJet must file a notice of appearance within twenty-one (21) days after entry of the order, unless otherwise ordered by the court. Pursuant to Utah DUCivR 83-1.3, no corporation, association, partnership, limited liability company or other artificial entity may appear *pro se* but must be represented by an attorney who is admitted to practice in this court.

☐ This Motion is made with the client's consent, which is attached to this motion.

☒ This motion is made without the client's consent and is accompanied by:

X certification that Client has been served with (i) a copy of this motion, (ii) the attached written description of the status of the case, Exhibit A hereto, including the dates and times of any scheduled court proceedings, pending compliance with any existing court orders, and the possibility of sanctions (see Certificate of Service on Client attached hereto as Exhibit B); or

____ certification that the Client cannot be located or, for any other reason, cannot be notified of the pendency of the motion and the status of the case.

 X The undersigned certify

 X no trial date is set; or

____ trial is set for _____ and

____ a certification signed by the substituting attorney is attached, indicating such attorney has been advised of the trial date and will be prepared for trial; or

____ a certification signed by Counsel is attached indicating that Client is prepared for trial as scheduled and is eligible pursuant to DUCivR 83-1.3 to appear pro se at trial; or

____ the following specific facts justify withdrawal of counsel without present appearance of substitute counsel or appearance by the individual party:

 X The form of an order is attached to this motion and has been submitted in word format by email to the presiding judge in this case.

Submitted this 27th day of March 2025.

/s/ Nathan D. Thomas

/s/ Elizabeth M. Butler

(signed by Nathan Thomas with permission
via electronic mail dated March 27, 2025)

PARSONS BEHLE & LATIMER

Nathan D. Thomas (USB #11965)

Elizabeth M. Butler (USB #13658)

/s/ Martin Bader

/s/ Jesse Salen

(signed by Nathan Thomas with permission
via electronic mail dated March 27, 2025)

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

Martin R. Bader (*pro hac vice*)

Jesse A. Salen (*pro hac vice*)

/s/ Patrick McGill

(signed by Nathan Thomas with permission
via electronic mail dated March 27, 2025)

MCGILL & CO., P.C.

Patrick McGill (*pro hac vice*)

CERTIFICATE OF SERVICE

I hereby certify that, on this 27th day of March 2025, that a true and correct copy of the foregoing has been filed with the Clerk of Court, by using the CM/ECF system to deliver a true and correct copy of the foregoing to the following:

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/s/ Nathan D. Thomas